

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING  
(PROPOSAL FOUR)

Docket No. RM2016-12

MOTION OF THE UNITED STATES POSTAL SERVICE  
SEEKING AN EXTENSION OF THE DEADLINE FOR REPLY COMMENTS

(October 24, 2016)

Order No. 3482 (August 24, 2016) initially set October 7 as the deadline for initial comments in this proceeding. On September 30, 2016, UPS filed a motion for a two-week extension to the initial comment deadline. The Postal Service responded the next business day, October 3. The Postal Service did not oppose a one-week extension, as long as the interval for reply comments was extended by one week as well. Citing the complexities of the issues presented in the proceeding, Order No. 3546 (October 4, 2016) partially granted the UPS motion, and reset October 17, 2016 as the deadline for initial comments in this proceeding, and October 31 as the deadline for reply comments. Despite lengthening the period for initial comments, Order No. 3546 did not lengthen the interval for reply comments (as the Postal Service had requested).

On October 17, UPS filed a substantial body of material supporting its comments in opposition to Proposal Four. The size and/or format of the public files was so large that it created difficulties in uploading the information onto the Commission's webpage, delaying access by one day. The nonpublic files were also large.<sup>1</sup> Moreover, these

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<sup>1</sup> UPS submitted a multitude of program and data sets. By our count, the UPS overall submission includes 10 different new STATA programs, 11 different new R programs, 405 new STATA data sets, 5 new R datasets and 76 new Excel workbooks.

materials, rather than simply presenting variations on the types of econometric work presented by the Postal Service, constituted materially different types of analyses.<sup>2</sup> In making these observations, the Postal Service is in no way criticizing UPS for the scope of its supporting documentation, but instead explaining some of the reasons why immediate comprehension of the contents of that documentation was not feasible, despite very prompt efforts by the Postal Service to digest this material as it was becoming available.

Suffice to say that the body of materials submitted by UPS has done nothing to reduce the complexities of the issues in this docket cited by the Commission in Order No. 3546. The Postal Service has already (on October 20 and 21) submitted two sets of potential Information Request questions. These questions underscore the types of challenges presented merely in understanding the UPS presentation, which obviously must precede any meaningful ability to react. If and when the Postal Service can obtain answers to all of these questions remains uncertain. Moreover, since the Postal Service has not yet even finished its review of all of the UPS files, further questions may be necessary.

Order No. 3546 (at page 3) noted the benefits of “well-informed” comments. Under the present circumstances, the Postal Service does not foresee any reasonable prospects of providing well-informed reply comments by the current deadline of October

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<sup>2</sup> The UPS submission is not solely a comment or revision of the analysis put forth in Proposal Four. Rather, it is comprised of entirely new analyses which, in many instances, make use of data not analyzed in Proposal Four. In many way the UPS analysis is more extensive and complicated than the original proposal, for which parties originally had seven weeks from filing (August 22 – October 7) to analyze, later revised to eight weeks (August 22 – October 17).

31. Given these circumstances, the Postal Service submits that a two-week delay of the reply comment deadline (until November 14, thus spanning the November 11<sup>th</sup> holiday) will be necessary to prepare an appropriate response. Therefore the Postal Service respectfully requests that the deadline for reply comments in this proceeding be extended for all parties until November 14, 2016.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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